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March 11, 2008

Via Facsimile - 212-805-7902

Honorable Deborah A. Batts

United States District Court

Southern District of New York

500 Pearl Street, Room 2510

New York, NY 10007

Attention: Corrine Williams

RE: SAMMART FASHION CO. LTD v. WEAR ME APPAREL CORP. d/b/a KIDS  
HEADQUARTERS AND HEYMAN CORPORATION  
Case No. 07 CV 4035  
*Motion to Dismiss for Lack of Personal Jurisdiction*

Dear Judge Batts:

The undersigned serves as co-counsel to the Plaintiff, and I have discussed with Defendant Heyman Corporation's local counsel their motion to dismiss this litigation for lack of personal jurisdiction presently before the Court. This motion was electronically filed on February 26, 2008 and pursuant to Local Rule 6.1, Plaintiff had ten days to answer this motion which would be March 11, 2008. This letter shall serve as the Plaintiff's first request for an extension of time to file responsive pleadings. Pursuant to Your Honor's local rules, the parties have conferred and agreed upon a briefing schedule on Defendant's motion, wherein Plaintiff will file opposition papers by April 4, 2008, and Defendant shall serve its reply papers by April 17, 2008.

If this is acceptable to Your Honor, we will proceed in accordance with the above.

Respectfully,

  
MITCHELL MALZBERG, ESQ.

MM/sb

Cc: Gary A. Stahl, Esq. (Via Facsimile - 212-223-4134)

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**SO ORDERED**

  
DEBORAH A. BATTS 3/11/08  
UNITED STATES DISTRICT JUDGE